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January 29, 2020

VIA ECF & EMAIL
(Failla_NYSDChambers@nysd.uscourts.gov)

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

RE: Commissions Import Export S.A. v. Republic of the Congo et al., 1:19-mc-00195-KPF

Dear Judge Failla:

We represent Respondent Ecree LLC in the above-referenced matter, and we write to address Petitioner Commissions Import Export S.A.'s January 28, 2020 letter to this Court. (ECF No. 48).

In response to our January 24, 2020 letter (ECF No. 47), Petitioner neither objected to our request for a briefing schedule, nor did it object to our proposed timeline to file our papers. Petitioner also did not object to our request that Your Honor refrain from issuing a ruling on the pending motion for a Default Judgment until the Court has reviewed our papers. Accordingly, we respectfully reiterate these requests, including our request that we have until February 18, 2020 to submit our motion papers.

While we recognize that the foreclosure complaint was included as an Exhibit to Respondent Republic of the Congo's memorandum in support of its motion to vacate (ECF No. 35), we are neither currently representing Ecree LLC in the foreclosure action, nor is the Petition in this matter related to the foreclosure action. Petitioner's submission regarding our knowledge of the foreclosure action is entirely without factual basis.

We thank the Court for its consideration of these requests.

Respectfully Submitted,

January 29, 2020
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By: /s/ Daniel Schnapp
DANIEL SCHNAPP

Counsel for Ecree LLC

cc: Counsel of record by ECF